ACCIDENT EVALUATION

Christopher Stoneman Norfolk Iron & Metal and James Ajello

PREPARED BY:



154 Hughes Lane St. Charles, MO 63301 F 636.896.9695

T 636.896.9995

Plaintiff's

Exh B

For:

BROWN & JAMES, P.C. Attention: Mr. Michael B. Lester 2345 Grand Boulevard, Suite 2100 Kansas City, Missouri 64108

EXHIBIT L



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Addendum



I. PROJECT SUMMARY

PROJECT ASSIGNMENT

On September 24, 2021, Semke Forensic (Semke) was requested by Mr. Michael B. Lester with Brown & James P.C. to evaluate a vehicular accident. The accident occurred on July 16, 2018 when a tractor-trailer and a straight truck collided on I-670 in Kansas City, Missouri. This investigation was assigned to the direction of Semke Principal Engineer Mr. Fred B. Semke, P.E., as Semke Project No. 21754.

SCOPE OF PROJECT

Specifically, Semke was requested to render professional opinions regarding the accident.



II. PROCEDURES

1. The following documents were reviewed:

- Kansas City, Missouri Police Department Crash Report No. 18-54033.
- Petition.
- Plaintiff's Answers To Defendant James J. Ajello's First Interrogatories.
- Defendant Norfolk Iron & Metal (NIM) and James J. Ajello's Answer To Plaintiff's Petition For Damages.
- Defendants' Responses And Objections To Plaintiff's First Request For Production Of Documents.
- Defendant James J. Ajello's Answers And Objections To Plaintiff's First Set Of Interrogatories.
- Provided photographs taken at the accident scene.
- Report authored by Mr. Scott Turner.
- Commercial Driver License Manuals.
- Federal Motor Carrier Safety Regulations (FMSCR).

2. The deposition transcripts and exhibits of the following individuals were reviewed:

- Mr. James Ajello.
- Mr. Christopher Stoneman.
- Mr. Scott Turner.
- Mr. Joseph Spencer.
- Mr. Richard Shoemaker.
- 3. Analysis was performed to evaluate the accident events.
- 4. Accident scene and analysis diagrams were prepared.



III. DISCUSSION

BACKGROUND

The accident occurred on westbound I-670, east of the 13th Street exit. In the vicinity of the collision, westbound I-670 was a three-lane road oriented east-west. The roadway was predominately asphalt, but a concrete bridge deck spanned the roadway near the accident scene. The left and middle lanes were travel lanes which continued west on I-670 and the right lane was an exit only lane which continued onto 13th Street west of the accident scene. The roadway contained a gradual right turn for vehicles approaching the accident scene, followed by a short straight section immediately west of the 13th Street exit ramp. The accident scene is shown in **Figures 1 and 2** and in the diagram included as **Attachment 1** in the Addendum.

On July 16, 2018, a collision occurred between a tractor-trailer driven by Mr. James Ajello and a straight truck driven by Mr. Christopher Stoneman. The Kansas City, Missouri Police Department responded to the accident, and Crash Report No. 18-54033 was subsequently prepared. The Crash Report indicated the accident occurred at 12:00 p.m., however Mr. Ajello documented the accident as occurring at 11:40 a.m. on the "NIM Transportation Driver's Report at Accident/Incident Scene." His reported accident time of 11:40 a.m. was consistent with GPS tracking records for his truck. The Crash Report further stated the collision occurred between the front of the tractor-trailer and rear of the straight truck while both vehicles were in the left lane of westbound I-670 as shown in **Attachment 2**. Following the collision, the vehicles came to a stop in the left lane, but were subsequently moved onto the 13th Street exit ramp to open the travel lanes of I-670 to traffic as shown in **Attachment 3**.

The Crash Report stated the collision occurred in cloudy conditions and on a dry roadway. The posted speed limit on I-670 was 45 mph.





FIGURE 1: Satellite view of westbound I-670. The arrow points to the approximate area of impact.



FIGURE 2: Westbound I-670 in the vicinity of the accident.



TRACTOR-TRAILER

The tractor-trailer consisted of a truck-tractor and a trailer. The truck-tractor was a 2017 Freightliner Cascadia conventional truck-tractor bearing Vehicle Identification Number (VIN) 3AKJGED10HSJA1798. It was equipped with a 15.6 liter Detroit Diesel DD16 engine and an anti-lock brake system. As a result of the collision, the truck-tractor sustained damage to the front of the vehicle, including the hood, windshield, and grille guard.

The trailer was a conestoga style semi-trailer that was 50 feet in length. The trailer was not damaged in the accident. The tractor-trailer combination is shown in **Figures 3** through 5.



FIGURE 3: Left front view of the tractor-trailer.





FIGURE 4: Right front view of the tractor-trailer.

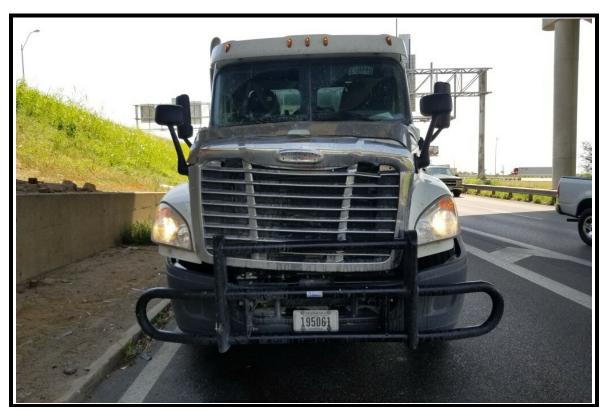


FIGURE 5: Front view of the tractor trailer.



STRAIGHT TRUCK

The straight truck was identified as a 2018 Kenworth T370 conventional cab truck bearing VIN 2NKHHJ7X4JM191851. The straight truck was equipped with a PACCAR PX-9 diesel engine, an antilock brake system, and roll-back assembly to facilitate transportation of dumpsters. An overall view of the straight truck was not available, but a similar straight truck is shown in **Figure 6**.

As a result of the collision, the rear bumper detached from the truck as shown in **Figure 7**.



FIGURE 6: Similar straight truck.





FIGURE 7: Rear view of the straight truck.



ANALYSIS

Differing accounts of the accident events were provided by the two drivers. The driver of the straight truck, Mr. Christopher Stoneman, indicated his truck was established in the left lane for an extended period of time before he braked for traffic ahead of him and was subsequently impacted from the rear by the tractor-trailer. On the contrary, the driver of the tractor-trailer, Mr. James Ajello, indicated his rig was established in the left lane and the straight truck, which had been traveling in the middle lane, quickly merged closely in front of his tractor-trailer while he was braking for stopped traffic ahead. Mr. Scott Turner assumed Mr. Stoneman's account of the accident was accurate and never considered Mr. Ajello's description of the accident events. Semke's analysis of the accident included the events as recounted by Mr. Ajello.

Both drivers indicated they were traveling near the posted speed limit of 45 mph prior to observing the stopped or slowing traffic ahead of them on I-670. Furthermore, both drivers indicated the straight truck was stopped, or nearly stopped, when the collision occurred. The damage sustained by the trucks, as well as the statement of Mr. Ajello, indicated the tractor-trailer was traveling approximately 5 mph faster than the straight truck at the time of the collision. Based on this information, the relative positions of the two vehicles in the seconds leading up to the collision were calculated.

As the vehicles approached the accident scene, the straight truck was in the middle lane with the rear of the straight truck approximately 23 feet in front of the tractor-trailer, which was consistent with Mr. Ajello's description. Mr. Stoneman's lane change maneuver started about 3.8 seconds prior to the collision, and started simultaneously with the application of his brakes in order for him to stop without colliding with the stopped traffic ahead. Mr. Stoneman executed the lane change maneuver as he progressed through a right turn, therefore the lane change maneuver would not have required significant lateral acceleration and would have been completed quickly. Research conducted for drivers in similar situations indicated Mr. Ajello would have required approximately 0.9 seconds to perceive, react, and fully apply the brakes on the tractor-trailer in response to the emergency braking scenario caused by Mr. Stoneman's lane change maneuver. As a result, Mr. Ajello was not able to avoid colliding with the straight truck due to the proximity of the two vehicles when Mr. Stoneman began merging into the left lane. The relative positions and speeds of the vehicles are shown in the time-distance-velocity diagrams included as **Attachment 4**.

In his report, Mr. Scott Turner argued the collision was caused by Mr. Ajello following too close to the vehicle in front of him. Mr. Turner cited the Commercial Driver License Manual, which indicated tractor-trailers, such as the one driven by Mr. Ajello, should maintain a seven second gap to the vehicle in front. However, although this is a well-intentioned guideline, it is not always reasonable or practical to maintain such a large gap, especially in congested or metropolitan areas. This is due to the fact that in populated areas, such as the Kansas City metropolitan area, other vehicles will constantly merge into a gap of that length, as illustrated when Mr. Stoneman attempted to merge into the gap maintained by Mr. Ajello to the vehicle in front of him. In contrast to Mr. Turner's assessment, Mr. Ajello had maintained a safe gap to the vehicle in front of him prior to Mr. Stoneman forcing his vehicle in front of the tractor-trailer. In fact, if



Mr. Stoneman had not aggressively merged into the left lane, Mr. Ajello would have been able to stop behind the traffic in front of him with a moderate brake application of 0.33g's as shown in **Attachment 5**.

Mr. Turner further stated Mr. Ajello caused the accident by operating his tractor-trailer at a speed too fast for conditions and by failing to keep a proper lookout. However, neither of these accusations were supported by the evidence. There was no evidence Mr. Ajello was traveling above the posted speed limit of 45 mph. Furthermore, both drivers indicated they were traveling approximately the same speed of 45 mph prior to the collision. Rather, the evidence indicated Mr. Ajello was keeping a proper lookout for traffic ahead of him since he began slowing his tractor-trailer before Mr. Stoneman merged in front of him. As such, Mr. Ajello was aware of the slowed traffic and reacted appropriately. In contrast, Mr. Stoneman was the driver who failed to keep a proper lookout by executing a lane change in close proximity to the tractor-trailer, and stopping suddenly before Mr. Ajello could build a gap in front of his tractor-trailer. If Mr. Stoneman had kept a proper lookout and been aware of his surroundings, he should have slowed his straight truck in the middle lane to a speed consistent with adjacent traffic. Thereafter, he would have been able to merge safely into the left lane.

Regarding Mr. Ajello, he obtained his Commercial Driver's License (CDL) in Kansas and started his commercial driving career in May 1987. To obtain his Kansas CDL, he passed associated written and driving tests. Therefore, Mr. Ajello was familiar with the Kansas Commercial Driver's License Manual. Mr. Turner specifically honed in on the guidelines for following distance during highway travel, which are not reasonably attainable in congested metropolitan areas as previously discussed. Note, the Kansas CDL manual also states a driver should be able to stop within the distance you can see ahead, and when driving in heavy traffic, the safest speed is the speed of the other vehicles. Mr. Ajello was traveling in accordance with these recommendations until he was cut off by Mr. Stoneman. Therefore, rather than the accident being a preventable crash for Mr. Ajello and a non-preventable crash for Mr. Stoneman, the opposite was likely the case.

Mr. Turner also painted Mr. Ajello has being an unsafe driver who was not properly trained by NIM. The evidence indicated otherwise. Mr. Ajello testified he passed the CDL tests on his first attempts, which confirmed his knowledge of the driving material in the Kansas CDL manual and the Federal Motor Carrier Safety Regulations (FMCSR's). Neither of these references mention the Smith System, rather the 5 Keys in the Smith System stem from the guidelines in the FMCSR's and the CDL manual. Regarding NIM, they had an extensive Driver Qualification file for Mr. Ajello, which documented sufficient ongoing training and multiple annual reviews praising his driving performance. In addition, Mr. Ajello's driving record is further evidence of his capable driving skills. Between the time of his hiring by NIM in November 2001 to the time of the subject accident, Mr. Ajello accumulated over a million miles driving without a single injury related accident attributable to him. Therefore, there is no merit to Mr. Turner's claims Mr. Ajello was an unsafe driver who was not properly trained by NIM.



In summary, more likely than not, the accident occurred as indicated by Mr. Ajello. Mr. Ajello was operating his tractor-trailer in a safe manner with an appropriate and reasonable gap to the vehicle in front of him. The accident was subsequently caused by Mr. Stoneman executing an aggressive lane change maneuver in front of Mr. Ajello's tractor-trailer, thus violating Mr. Ajello's established travel path. As a result, Mr. Ajello did not have sufficient remaining time or distance to avoid the collision. Furthermore, but for the intrusion of Mr. Stoneman into his path, Mr. Ajello would have safely slowed or stopped for the traffic in front of him.

PROFESSIONAL SERVICE INFORMATION

The qualifications of the author, his Fee Schedule, and his Testimony List are included as **Attachments 6, 7, and 8** in the Addendum, respectively.



IV. SIGNATURE

Semke Forensic hereby certifies the expressed opinions and conclusions have been formulated within a reasonable degree of professional certainty. They are based upon all of the information known by Semke as of the time this report was issued, as well as knowledge, skill, experience, training, and/or education.

Report Prepared By:

Fred B. Semke, P.E.

Fred B. Sembe

Principal Engineer

State of Missouri

Registration No. 28830

ISSUE DATE: January 14, 2022

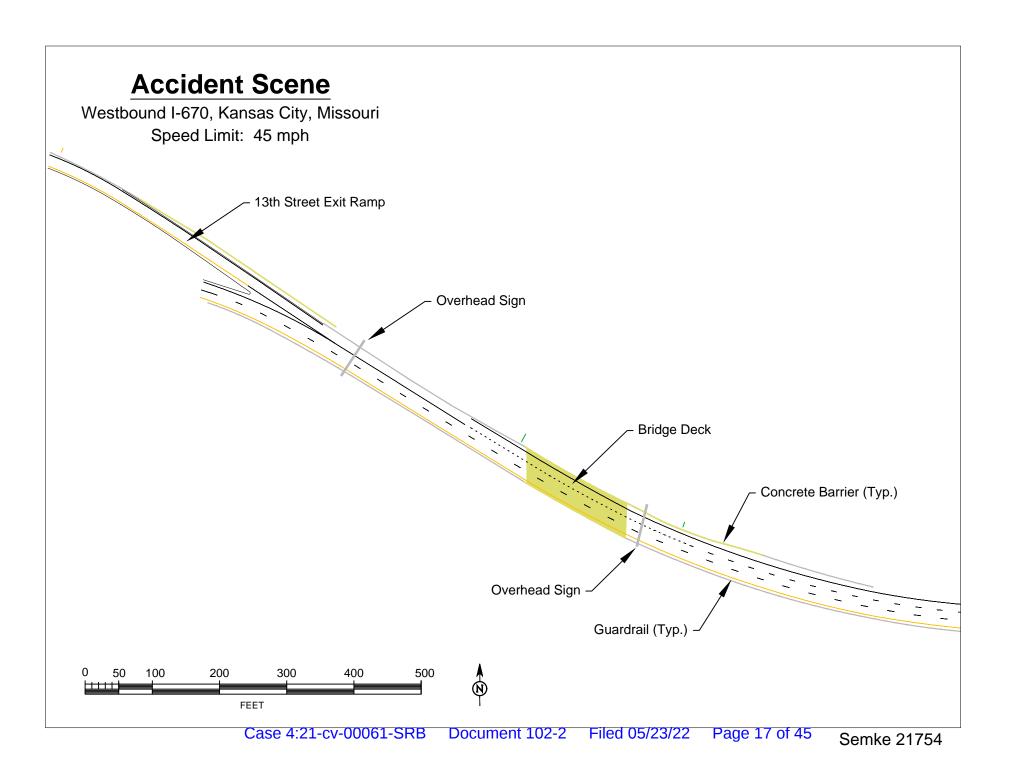


ADDENDUM

- Attachment 1 Accident Scene Diagram
- Attachment 2 Impact Position Diagram
- **Attachment 3 Final Rest Positions Diagram**
- **Attachment 4 Subject Accident Time And Position Diagrams**
- **Attachment 5 Straight Truck Does Not Merge Diagrams**
- **Attachment 6 Curriculum Vitae**
- Attachment 7 Fee Schedule
- Attachment 8 Testimony List

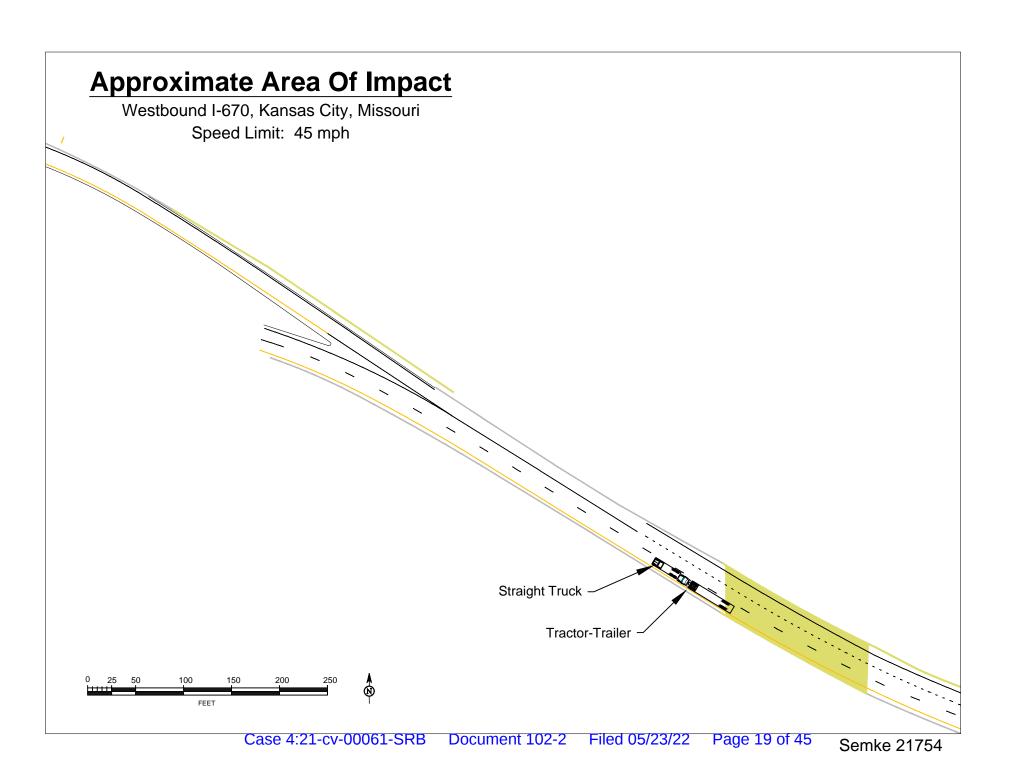


Accident Scene Diagram



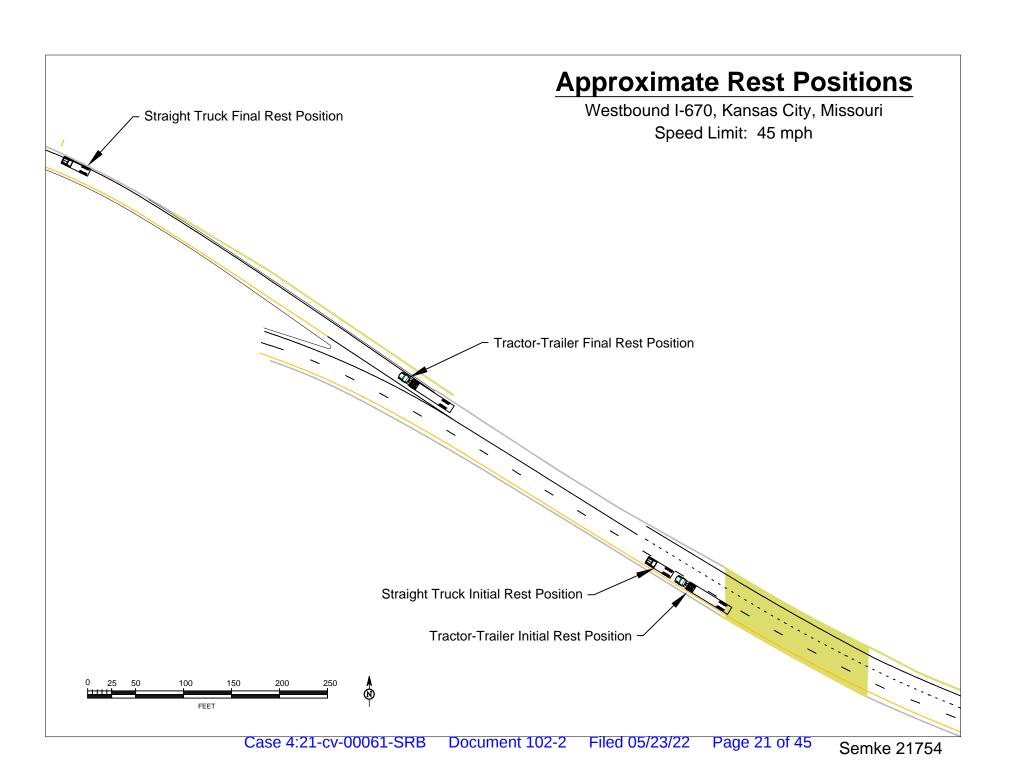


Impact Position Diagram



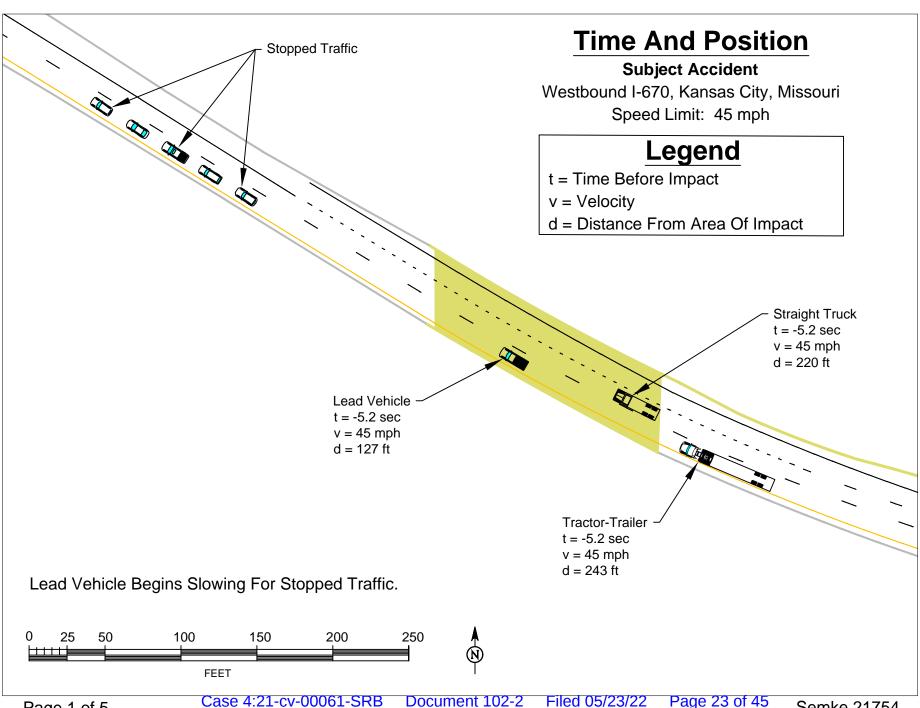


Final Rest Position Diagram





Subject Accident Time And Position Diagrams



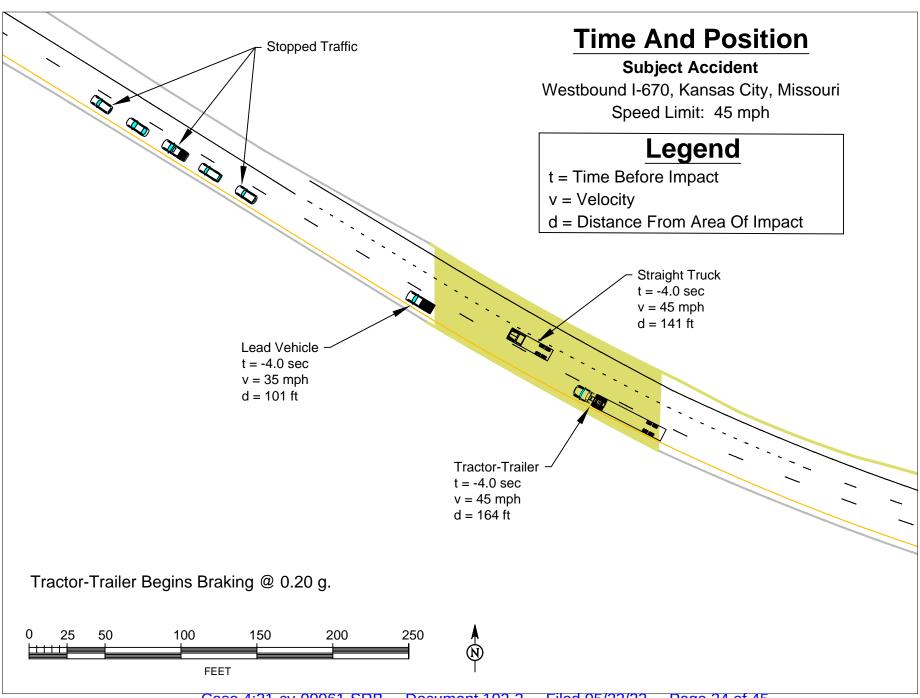
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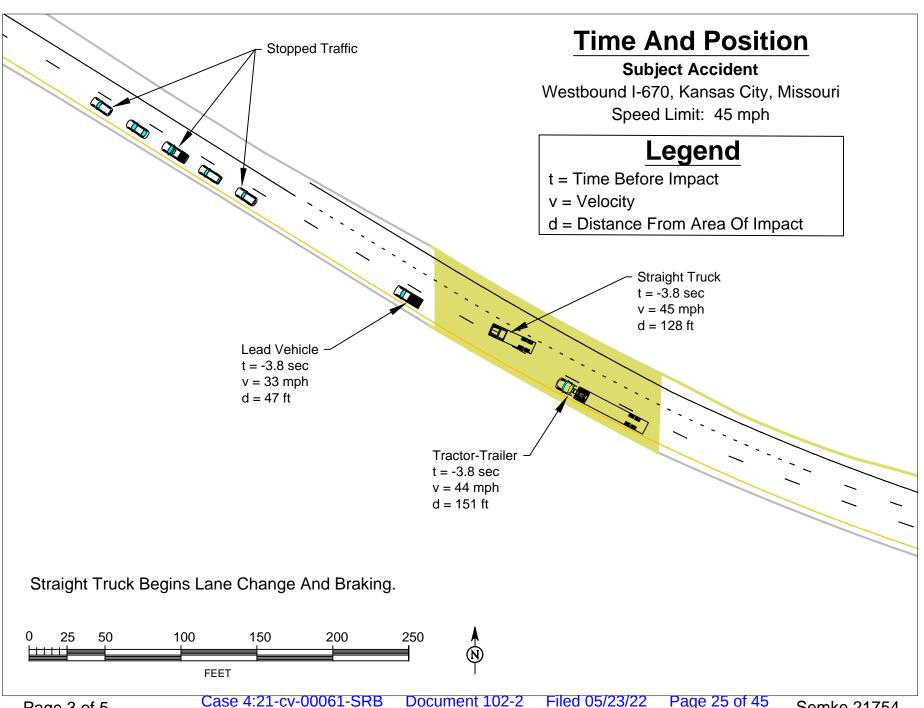
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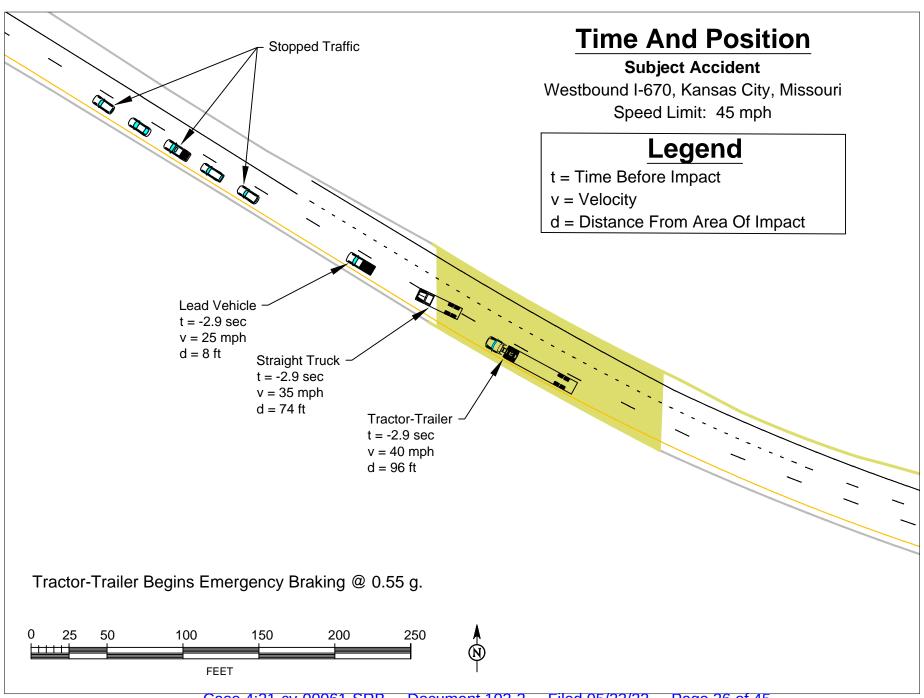
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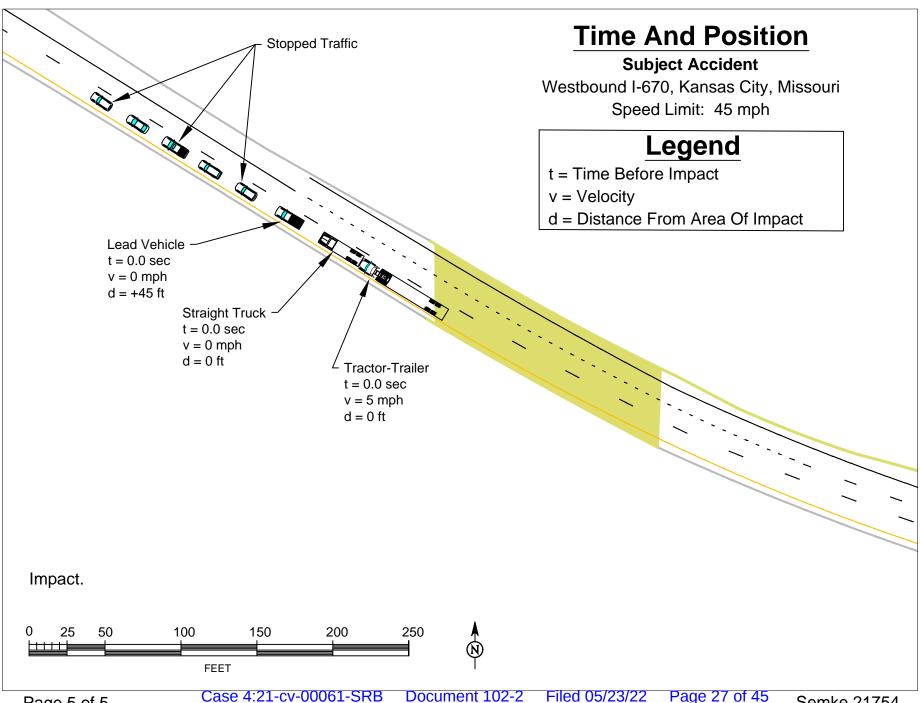
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Page 4 of 5 Case 4:21-cv-00061-SRB Document 102-2 Filed 05/23/22 Page 26 of 45 Semke 21754



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Document 102-2

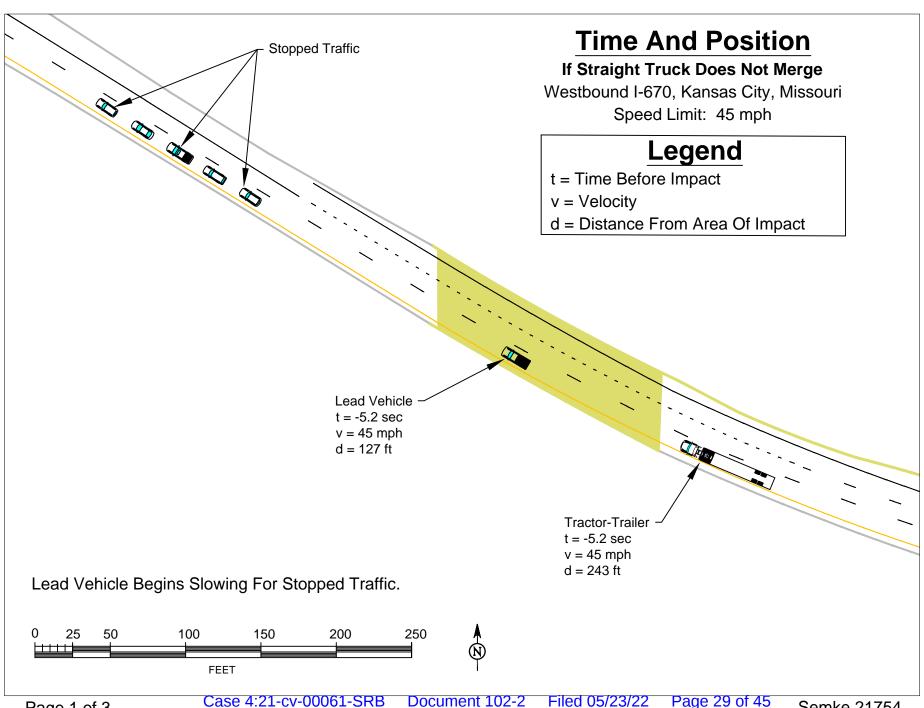
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Straight Truck Does Not Merge Diagrams



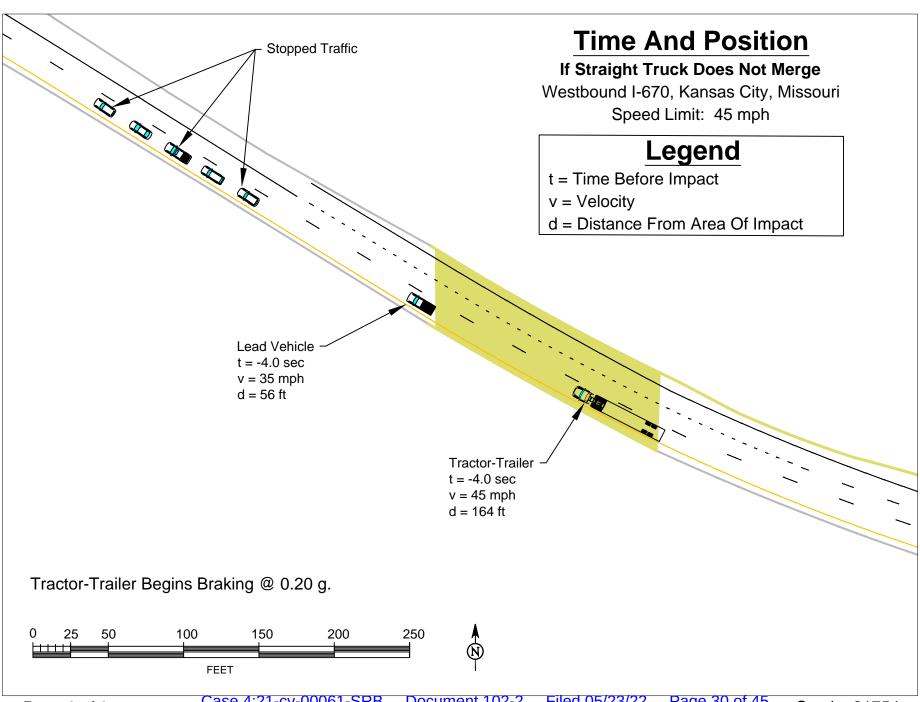
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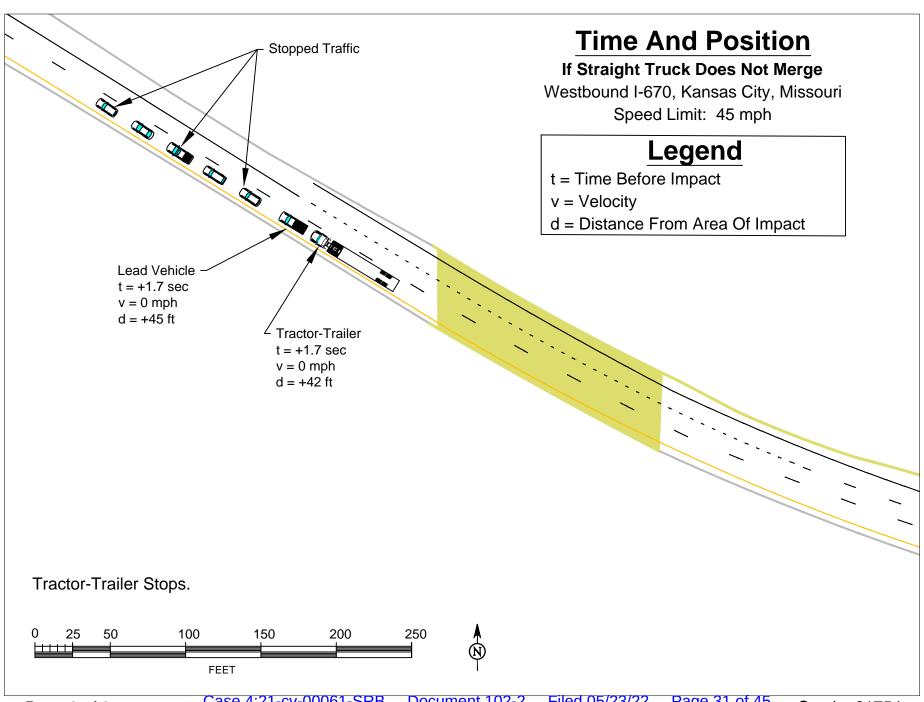
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Curriculum Vitae



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CURRICULUM VITAE OF FRED B. SEMKE, P.E.

January 2022

I. General Information

A. Position Principal Engineer

Semke Forensic 154 Hughes Lane St. Charles, Missouri Telephone: 636-896-9995

II. <u>Professional Summary</u>

A. Education: Master of Science

Engineering Mechanics University of Missouri

Rolla, Missouri

1986

Bachelor of Science - Magna Cum Laude

Mechanical Engineering University of Missouri University Scholar Columbia, Missouri

1983

St. Charles R-5 High School

St. Charles, Missouri

Valedictorian

1978



Professional Resume Page 2 Fred B. Semke

В. Experience:

January 2003 to Present

Position: Principal Engineer

> Semke Forensic 154 Hughes Lane St. Charles, Missouri

Responsible for mechanical engineering projects with emphasis in vehicular accident reconstruction, failure analysis, mechanical design analysis, fire suppression systems and fuel-fired equipment.

March 1997 to January 2003

Position: Senior Project Engineer - Mechanical

> FTI/S.E.A. Consulting St. Louis, Missouri

Responsible for mechanical engineering projects with emphasis in vehicular accident reconstruction, failure analysis, mechanical design analysis, fire suppression systems and fuel-fired equipment.

May 1983 to March 1997

Position: Mechanical Engineer

McDonnell Douglas Corporation

St. Louis, Missouri

Responsible for aircraft design and analysis.

C. Hold a Class A Commercial Vehicle Driver's License (CDL) with all endorsements.



Professional Resume Fred B. Semke

III. Seminars and Technical Courses Attended

- 1984 Strength and Mass Properties
- 1985 Ethical Decision Making Workshop
- 1986 Hazardous Materials Communication
- 1987 Effective Writing
- 1987 Structural Analysis Laminated Composites
- 1987 Metal Matrix Composites
- 1988 Respirator Training
- 1988 Fatigue/Fracture Mechanics
- 1993 Time Management
- 1998 SAE Technical Session, Accident Reconstruction
- 1999 SAE Technical Session, Accident Reconstruction
- 1999 SAE Seminar, Braking Performance of Heavy Commercial Vehicles
- 2000 World Reconstruction Exposition
- 2001 SAE Technical Session, Accident Reconstruction
- 2002 SAE Technical Session, Accident Reconstruction
- 2002 MTC Truck Driver Training Course
- 2003 SAE Technical Session, Accident Reconstruction
- 2004 SAE Technical Session, Accident Reconstruction
- 2005 SAE Seminar Vehicle Accident Reconstruction Methods
- 2006 Crash Data Retrieval (CDR) Technician Certification Course
- 2006 Crash Data Retrieval (CDR) Data Analyst Certification Course
- 2007 SAE Technical Session, Accident Reconstruction
- 2008 Crash Data Retrieval User's Conference
- 2008 SAE Seminar Applied Vehicle Dynamics
- 2008 BMW Performance Driving School SAE Driving Event
- 2009 SAE Technical Session, Accident Reconstruction / EDR's
- 2009 Midwest Association of Technical Accident Investigators (MATAI) Seminar
- 2009 Bendix Air Brake Class
- 2009 Heavy Vehicle Crash Reconstruction Conference
- 2010 Commercial Vehicle Event Data Recorders (University of Tulsa)
- 2010 SAE Technical Session, Accident Reconstruction / EDR's
- 2010 J. J. Keller, Forklifts: FAQs on OSHA's Standard
- 2010 Accessing and Interpreting Heavy Vehicle Event Data Recorders (SAE)
- 2011 SAE Highway Vehicle Event Data Recorder Symposium
- 2012 SAE Technical Session, Accident Reconstruction / EDR's
- 2013 Advanced Crash Reconstruction Utilizing Human Factors (NUCPS)
- 2013 Midwest Association of Technical Accident Investigators (MATAI) Seminar
- 2014 Midwest Association of Technical Accident Investigators (MATAI) Seminar
- 2015 Digital Forensics of Heavy Vehicle Event Data Recorders (Univ. of Tulsa)
- 2016 World Reconstruction Exposition



Professional Resume Page 4 Fred B. Semke

IV. **Professional Affiliations**

Society of Automotive Engineers (SAE)

Society of Accident Reconstructionists (SOAR)

National Assoc of Professional Accident Reconstruction Specialists (NAPARS)

Midwest Association of Technical Accident Investigators (MATAI)

European Association for Accident Research and Analysis (EVU)

American Society of Mechanical Engineers (ASME)

American Society of Agricultural and Biological Engineers (ASABE)

National Fire Protection Association (NFPA)

American Society of Heating, Refrigerating and Air-Conditioning Engr (ASHRAE)

V. **Professional Registration**

Registered Professional Engineer in the States of Missouri, Illinois, Arkansas, Kentucky, Kansas, Oklahoma, Iowa, Alabama and Idaho.

VI. **Civic Involvement**

President, Board of Education, St. Charles R-5 Schools, January 1997 to April 2015.



Fee Schedule



St. Louis

154 Hughes Lane St. Charles, MO 63301

T 636.896.9995

F 636.896.9695

Professional Fee Schedule

• Fred B. Semke, P.E. - \$335/hour

Clerical - \$75/hour

- Hourly fees are the same for all activities (examinations, travel, reports, depositions, trial testimony, research, meetings, telephone calls, etc.).
- Major Expenses: Mileage (\$0.67/mile), Photographs (\$0.50/photo), Equipment/Software (\$250.00/use), 3D Scanner (\$500.00/use).
- Expenditures: At cost (hotel, airfare, meals, rental vehicles and/or equipment, etc.).



Testimony List

Case No.	Case Name	Type	Date	Venue	Court No.
14453	Alexander Wiesner v. Road Warrior Roadside Service & Towing	Trial	02/18	Circuit Court Boone County Missouri	14BA-CV0246
14564	Lacy & Hebenheimer v. CRST Expedited	Trial	02/18	Circuit Court Warren County Missouri	15BB-CC00051 15BB-CC00054
16821	Joyce Meyers v. Joshua Funk	Trial	03/18	Circuit Court Calhoun County Illinois 8th Judicial Circuit	2015-L-1
17137	William Walsh v. Wamano Trucking LLC	Depo	04/18	Circuit Court Green County Illinois 7th Judicial Circuit	16-L-4
15806	Carrie Scheetz v. Nauvoo-Colusa Community Unit School District	Depo	04/18	Circuit Court Hancock County Illinois 9th Judicial Circuit	16 LL 1
17633	Michael E. Brand v. Midwest Security	Depo	06/18	Circuit Court Greene County Missouri Division 3	1531-CC01410
17935	Daniel Sickler v. Justin Mosher	Depo	06/18	Circuit Court Phelps County Missouri	16PH-CV00063
17853	Innocent H. Harelimana v. Shannon L. Parker	Depo	09/18	Circuit Court St. Louis County Missouri Division 18	16SL-CC00506

Case No.	Case Name	Type	Date	Venue	Court No.
16699	Anne W. Jones v. Shelter Insurance	Depo	09/18	Circuit Court Jefferson County Missouri 23rd Judicial Circuit	14JE-CC00679
18369	Holly Bingaman v. Pride Mobility Products	Depo	10/18	Circuit Court St. Louis County Missouri Division 17	16SL-CC01859
14649	Jessica Mask v. Liberty Fruit Company	Trial	01/19	Circuit Court City of St. Louis Missouri Division 8	1722-CC00906
17093	Hugh Vanderheul v. New Prime, Inc.	Depo	02/19	Circuit Court Webster County Missouri	17WE-CC00020
16792	Fleshman v. Whelan Security Co.	Depo	03/19	Circuit Court St. Louis County Missouri Division 10	16SL-CC01803
16869	Maurice Newman v. Auto Enhancements, Inc.	Depo	03/19	District Court Douglas County Nebraska	CI 16-6896
17862	Linda Christine Maidment v. Davis Walker	Depo	03/19	Circuit Court Greene County Missouri	1631-CC00852
17289	Michael L. Greer v. Arnold Transportation Services, Inc.	Depo	05/19	U.S. District Court Western District Missouri Southern Division	6:18-CV-3122-MDH

Case No.	Case Name	Type	Date	Venue	Court No.
18551	Richardson v. DTC Calhoun Trucking, et al.	Depo	07/19	Circuit Court Greene County Missouri	1631-CC00107
18667	Dwayne E. Lieu v. Prairie Farms Dairy, Inc.	Trial	08/19	Circuit Court St. Louis County Missouri	16SL-CC03778
18906	Robert J. Ruzicka v. Huntleigh Transportation Services, Inc.	Depo	09/19	Circuit Court City of St. Louis Missouri Division No. 1	1622-CC01435
16840	Jo Lair v. Combined Transport, Inc.	Depo	10/19	U.S. District Court Southern District Illinois	3:18-CV-1017-MJR- DGW
16699	Anne W. Jones v. Derek Mains and Shelter Insurance Company	Trial	10/19	Circuit Court Jefferson County Missouri 23 rd Judicial Circuit	14JE-CC00679
18244	Erica Miller v. Robert Vickers, et. al.	Depo	10/19	Circuit Court City of St. Louis Missouri Division 11	1722-CC10922
16476	Brian W. Pillow v. William J. Goestenkors	Trial	11/19	Circuit Court Madison County Illinois 23 rd Judicial Circuit	16-L-380
18906	Robert J. Ruzicka v. Huntleigh Transportation Services, Inc.	Depo	11/19	Circuit Court City of St. Louis Missouri Division No. 1	1622-CC01435

Case No.	Case Name	Type	Date	Venue	Court No.
17897	De'Andre Baker v. Town and Country Disposal	Depo	02/20	Circuit Court Jackson County Missouri	1816-CV18405
19295	Kenneth Trekell v. Target Corporation	Depo	02/20	U.S. District Court Western Division Missouri	4:18-CV-00662-DGK
17935	Daniel Sickler v. Justin Mosher	Trial	03/20	Circuit Court Phelps County Missouri	16PH-CV00063
18106	Peter Monroe v. Freight All Kinds, Inc.	Depo	03/20	U.S. District Court Western District Missouri Southern Division	18-CV-03238
19844	Burnett v. Consolidated Pipe & Supply	Depo	03/20	Circuit Court Perry County Missouri	17PR-CC00038
18703	Richardson v. Millstone Trucking, LLC	Depo	04/20	Circuit Court Taney County Missouri	16AF-CC01203
19539	Shane Woollen v. Jacobson Transporation	Depo	05/20	U.S. District Court Eastern District Missouri	4:18-cv-01509
18103	Dee Ann Schirlls v. WCA Waste Corporation	Depo	07/20	Circuit Court Cass County Missouri	18CA-CC00082
16322	Tabitha Holt v. Qualified Trucking Service	Depo	07/20	U.S. District Court Eastern District Missouri	4:19-CV-102

Case No.	Case Name	Туре	Date	Venue	Court No.
18780	Zerpa v. XPO Logistics	Depo	09/20	Circuit Court Bates County Missouri	19BS-CC00037
19525	Brandelyn Williams v. Wilde Auto Sales	Depo	10/20	Circuit Court Jackson County Missouri	1916-CV26936
18784	Almazbek Muminov v. Swift Transportation	Depo	11/20	U.S. District Court Western District Missouri	4:19-cv-00390-ODS
18742	Smith and Woodgate v. St. James Winery, Inc.	Depo	01/21	Circuit Court Phelps County Missouri	19PH-CV01325 19PH-CV01343
19624	Robert O. Cross v. Dieomatic, Inc.	Depo	01/21	U.S. District Court Western District Missouri Western Division	4:19-CV-00168-SRB
20202	Logan Johnston v. Donald Wilson	Depo	02/21	Circuit Court Platte County Missouri Division No. 2	19AE-CC00310
19781	Ayad Danyal v. Kenneth Faiet	Depo	03/21	Circuit Court Livingston County Missouri	19LV-CC00011
18459	Jose Colon v. FedEx Ground	Depo	06/21	Circuit Court St. Charles County Missouri	1911-CC00052
21307	Lawrence E. Coffey v. Vespa & Skeff Distributing	Depo	07/21	Circuit Court Sangamon County Illinois 7 th Judicial Circuit	2017 L 72

Case No.	Case Name	Туре	Date	Venue	Court No.
18050	Chet Stoll v. Diamondback Services	Depo	08/21	Circuit Court St. Louis County Missouri	18SL-CC02952
18780	Zerpa v. XPO Logistics	Trial	08/21	Circuit Court Bates County Missouri	19BS-CC00037
19268	Larry Goehring v. MHTC	Depo	09/21	Circuit Court Cole County Missouri	18AC-CC00346
21314	Stephanie Collins v. Chumbelina Gotow, First Student, Inc	Depo	11/21	Circuit Court Jackson County Missouri	2116-CV05694
15753	Equis Hospitality Management v. Western States Fire Protection	Depo	12/21	Circuit Court St. Louis County Missouri Division No. 7	19SL-CC00278
21170	William Reynolds v. Bunker Hill Supply Company	Depo	12/21	Circuit Court Crawford County Illinois 2 nd Judicial Circuit	2019-L-3